

EXHIBIT 6

From: Schildkraut, Marc
Sent: Wednesday, January 10, 2018 4:32 PM
To: Umberger, Michelle M. (Perkins Coie)
Cc: Bansal, Dee
Subject: Reynolds-Dominion Meet and Confer

Here is a short summary of where I think we stand based on our meet and confer today.

1. R&R and CDK are splitting responsibilities on third party subpoenas. While they cannot provide absolute guarantees, the defendants have no intention of serving additional subpoenas on Dominion.
2. All the defendant attorneys that will have access to Dominion documents are litigation attorneys, not business attorneys advising the defendants. You will consult with CDK and circle back to Dominion with any necessary elaboration on this issue.
3. While it is not standard practice, the defendants will not object if Dominion redacts non-responsive materials in responsive documents.
4. Dominion intends to limit its production to the automotive space and within that space to applications that pull data from DMSs. You will need to consult with others and get back to Dominion on this issue.
5. We agreed that Dominion only needs to produce pre-existing documents from the FTC CID in the FTC's conduct investigation. Dominion will not be supplying narratives because they contain advocacy content.
6. We agreed that Dominion is not bound by the ESI order but can make use of the order as set forth in my letter to you.
7. It is Dominion's position that producing the pre-existing documents supplied to the FTC in response to the FTC's CID and responding to the requests seeking "documents sufficient to show" is a sufficient response to the subpoena. You committed to reviewing the FTC's CID further and getting back to Dominion on this issue. If additional responses were necessary, it would totally change the nature of the response and results in substantially more burden. You committed to re-reading the CID and getting back to us on this issue.
8. We agreed that Dominion will only be providing sufficient-to-show documents relating to third parties in response to request 8 and 9. Defendants would have the documents relating to defendants' data integration charges as well as defendants' data elements and types.
9. Dominion will not be producing any documents until all issues are resolved.

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